

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

1-5-15

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UNITED STATES OF AMERICA : PROTECTIVE ORDER
: ON CONSENT
- v. - : 12 Cr. 887 (ALC)
BENJAMIN DURANT, :
: Defendant. :
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With respect to the Colorado Bar Application and accompanying materials of Thomas Conradt (the "Materials"), which have been subpoenaed by the United States Attorney for the Southern District of New York and BENJAMIN DURANT, the defendant herein, upon the parties' understanding that the Materials will be produced by Colorado's Attorney Regulation Counsel ("Regulation Counsel"), and upon the consent of the parties,

IT IS HEREBY ORDERED that (1) the parties, including counsel, and any paralegal, staff, or assistant employed by the parties, are precluded from disseminating or publishing the Materials (and any copies) to anyone beyond the parties, counsel, and any paralegal, staff, or assistant employed by the by the parties and (2) at the conclusion of the trial of this matter or when any appeal has become final, counsel for each party will collect all Materials (including all copies) from any party, paralegal, staff, or assistant employed by the party and,

thereafter, either maintain the Materials as required by their duties and responsibilities as counsel or destroy (or return to Regulation Counsel) any remaining Materials (including all copies).

IT IS FURTHER ORDERED THAT, the parties may allow any witness or prospective witness, as designated by counsel, to review the Materials to assist with preparation for trial of this case. Counsel must (1) inform any witness or prospective witness provided with the Materials of the requirements of this Order; and (2) ensure that any of the Materials provided to any witness or prospective witness is returned to counsel after the trial of this matter in accordance with this order.

IT IS FURTHER ORDERED THAT, the parties will file any portion of the Materials that are included as exhibits to pleadings under seal.

IT IS FURTHER ORDERED THAT, if the Materials are used at trial, the parties will request that those portions of the transcript that reference the Materials be filed under seal.

IT IS FURTHER ORDERED THAT, Regulation Counsel may produce the Materials with a watermark on each page.

AGREED AND CONSENTED TO:

Dated: New York, New York
December 16, 2014

PREET BHARARA
UNITED STATES ATTORNEY

BY: _____

Jessica Masella
Andrew Bauer
Damian Williams
Assistant United States Attorneys

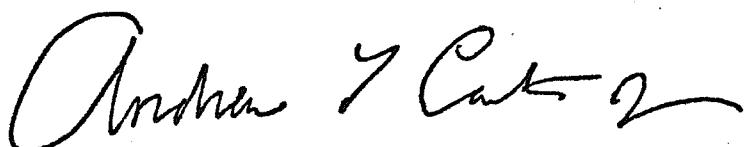
BENJAMIN DURANT

BY: _____

Peggy Cross-Goldenberg, Esq.
(Counsel for Benjamin Durant)

SO ORDERED:

Dated: New York, New York
December 18, 2014



HONORABLE ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE